

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	Crim. No. 18-30001-WGY
	)	
vs.	)	
	)	
DAPHNE MOORE, Defendant.	)	
	)	

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DEFENDANT'S MOTION FOR REASONABLE ACCESS  
TO COURT PROCEEDINGS BY WAY OF  
VIDEO CONFERENCING

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DAPHNE MOORE, a defendant in the above captioned case, hereby moves the court to provide simultaneous video conferencing of proceedings in the above captioned case, to the federal courthouse in Springfield, MA. In support of this Motion, the defendant, through counsel, states that:

1. Ms. Moore is a defendant in the superceding indictment returned on December 20, 2018, by a federal grand jury sitting in Springfield, MA;
2. Promptly following arraignment on December 21, 2018 at the federal district court sitting in Worcester, MA, recusals were filed by Judge Mark G. Mastroianni and Magistrate Judge Katherine Robertson, each of whom sit regularly in Springfield, MA;
3. Judge Michael Ponsor, formerly presiding judge of the court in Springfield, has taken senior status and no longer takes cases for trial;
4. The above captioned case was assigned to Judge William G. Young,

who regularly sits in Boston, MA;

5. Ms. Moore is a Springfield resident who is represented by undersigned counsel with her office in Springfield, MA;

6. Ms. Moore is charged with several conspiracies, each of which includes her daughter, NIA MOORE-BUSH, and her son-in-law, DINELSON DINZEY, as an alleged co-conspirators;

7. Since her arraignment, Ms. Moore has attended every court proceeding<sup>1</sup>, either in person or through counsel, involving an alleged co-conspirator;

8. The travel to Boston is both time consuming and expensive for Ms. Moore and her family, who have a particular interest in this case and specifically as related to NIA MOORE-BUSH;

9. The clerk of court at the Springfield as offered to assist in arranging video conferencing at the Springfield court, of Boston proceedings occurring in the above captioned case;

10. Counsel has made an informal request<sup>2</sup> directed through Judge Young's courtroom clerk, Jennifer Gaudet, and been informed that the Judge is

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<sup>1</sup>

Counsel missed the Rule 11 hearing for Amanda Atkins on April 24, 2019 at 11:00 am. Appearing at the Springfield Courthouse at the appointed time and date, counsel learned she was mistaken about the location of the hearing, which was actually then occurring in Boston.

<sup>2</sup>

The request was made on Monday, May 20<sup>th</sup> and renewed on the morning of May 21<sup>st</sup>.

not inclined to make the arrangements but that counsel is invited to file a formal motion;

11. Fundamental fairness requires, in the circumstances of this case, that Ms. Moore, her family and counsel be accommodated and allowed to attend the hearing(s) taking place in Boston, by way of video conferencing.

WHEREFORE, it is requested that the hearing regarding NIA MOORE-BUSH, presently scheduled for 2:00 p.m. on Tuesday, May 21, 2019 be video conferenced to the federal district court in Springfield, MA or, alternatively rescheduled for a date and time for the Springfield courthouse.

Respectfully submitted,  
DAPHNE MOORE, Defendant

/s/Linda J. Thompson  
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Certificate of Service

I certify that on May 21, 2019 I filed the foregoing document with the Court via the CM/ECF system, which will cause notice to be delivered electronically to all registered participants, and that I further sent paper copies to those indicated on the docket as non-registered participants, if any.

/s/ Linda J. Thompson

Linda J. Thompson

Linda J. Thompson, BBO # 496840